

**EXHIBIT A**

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JULIE DALESSIO, an individual,

Plaintiff,

V.

UNIVERSITY OF WASHINGTON, a Washington Public Corporation; Eliza Saunders, Director of the Office of Public Records, in her personal and official capacity; Alison Swenson, Compliance Analyst, in her personal capacity; Perry Tapper, Public Records Compliance Officer, in his personal capacity; Andrew Palmer, Compliance Analyst, in his personal capacity; John or Jane Does 1-12, in his or her personal capacity.

### Defendants.

| No. 2:17-cv-00642-MJP

**PLAINTIFF'S FIRST SET OF  
DISCOVERY REQUESTS**

## **AND DEFENDANTS' OBJECTIONS AND RESPONSES THERETO**

Comes now, Ms. Julie Dalessio, through her attorney Joseph Thomas, submits the following Interrogatories and Requests for Production of Documents pursuant to Fed. R. Civil P. 33 and 34.

**I. INTERROGATORIES.** In accordance with Rule 33 of the Federal Rules of Civil Procedure, you are required to answer the following interrogatories under oath within thirty (30) days after you receive them. These interrogatories are intended to discover information and/or documents not only within your personal knowledge or obtainable by you, but also information in possession of or obtainable by your attorneys, investigators, representatives, employees, agents,

1           4. Please identify with specificity the location of each of the documents produced in PR  
 2           2015-00570 and PR 2016-00760. The specificity of the location should include: the  
 3           department, the building, whether the location was secure (if so, how was it secure).  
 4           This interrogatory is addressed separately to and should be answered separately by:

- 5           A. University of Washington:
- 6           B. Eliza Saunders:
- 7           C. Perry Tapper:
- 8           D. Alison Swenson:
- 9           E. Andrew Palmer:

10           **RESPONSE: OBJECTION.** This request is unduly burdensome; overbroad; not proportional  
 11           to the needs of the case; not reasonably calculated to lead to the discovery of admissible evidence;  
 12           irrelevant. Without waiving said objections, see Defendant's Supplemental Initial Disclosures,  
 13           sent to Plaintiff on May 18, 2018 for citations to documents and descriptions of who located  
 14           and/or found the documents and where they were located when collected for transmittal to the  
 15           Office of Public Records.

16           A. University of Washington: Please see response below.  
 17           B. Eliza Saunders: does not have personal knowledge of this information; she would  
 18           have to review and research the same documents produced by the University to Plaintiff. She  
 19           does not have personal knowledge of the security of various buildings other than the Office of  
 20           Public Records and Open Meetings, which is located behind doors that remain locked at all times.  
 21           C. Perry Tapper: does not have personal knowledge of this information; he would  
 22           have to review and research the same documents produced by the University to Plaintiff. He does  
 23           not have personal knowledge of the security of various buildings other than the Office of Public  
 24           Records and Open Meetings, which is located behind doors that remain locked at all times.

25           D. **Alison Swenson: Copies of the documents produced in response to PR-2015-**  
 26           **00570 were transmitted to the Office of Public Records and were located there while she**

1 processed them for release. The locations of where the documents were located then transmitted  
 2 to her are reflected in the transmittal documents found at UW2001-2031. She does not have  
 3 personal knowledge of the security of various buildings other than the Office of Public Records  
 and Open Meetings, which is located behind doors that remain locked at all times.

4 E. Andrew Palmer: Copies of the documents produced in response to PR-206-00760  
 5 were transmitted to the Office of Public Records and were located there while he processed them  
 6 for release. The locations of where the documents were located then transmitted to him are  
 7 reflected in the transmittal documents found at UW2032-2401. He does not have personal  
 8 knowledge of the security of various buildings other than the Office of Public Records and Open  
 9 Meetings, which is located behind doors that remain locked at all times.

10 Upon information and belief, Ms. Dalessio's Human Resources Personnel File has been  
 11 maintained in the central campus Human Resources Office since she left the University. This is a  
 12 secure facility.

13 The Department of Laboratory Medicine consists of approximately 900 employees and  
 14 operates at several locations around Seattle. Employee Department files are typically maintained  
 15 at the Harborview location after separation. This is a secure facility and few employees have  
 16 access to these files that are maintained in a locked room before they are sent for long-term  
 17 storage at the Records Management System. The Department of Virology, where Ms. Dalessio  
 18 and Dr. Rhoda Morrow Ashley worked is located at Children's Hospital in Northeast Seattle  
 19 (Sand Point Way). Ms. Dalessio's Department of Laboratory Medicine file has been maintained  
 20 off-site in the Records Management System warehouse since 2005. This a secure facility located  
 21 on the grounds of Magnuson Park in Northeast Seattle. Records Management System staff does  
 22 not access files and records inside the boxes they are stored in. The boxes can only be checked  
 23 out from the Records Management System with authorization of a designated Records  
 24 Coordinator or Records Authority.

Copies of various records related to Ms. Dalessio appear to have been transmitted and stored electronically by the following individuals as part of the research, collection, and production process required under RCW 42.56, Washington's Public Records Act:

**Jeanie Miele**, former UW Medicine Compliance Analyst: records reflect that Ms. Miele received a request to locate records responsive to PR-2015-00570 sent by Alison Swenson, Office of Public Records, on September 16, 2015. Ms. Miele searched for a departmental representative who may be able to locate a Lab Medicine department file for Plaintiff. On September 17, 2015, Karen Holloway reported to Ms. Miele that she submitted the request to a Program Coordinator (presumably Matt Maria) so the records could be retrieved from storage in the Records Management System warehouse. On September 25, 2015, Ms. Miele received an email and attached a "Julie Dalessio file" via email from Karen Holloway and forwarded the records to the Office of Public Records on September 25, 2015 and again on October 8, 2015. See, UW002003, UW002455-UW002952.

**Karen Holloway**, former Associate Administrator, Dept. Laboratory Medicine: University records reflect on September 17, 2015, Karen Holloway reported to Jeane Miele that she submitted the request to a Program Coordinator (presumably Matt Maria) so the records could be retrieved from storage Records Management Services, an off-site storage facility. On September 25, 2015, Ms. Miele received an email and attached a "Julie Dalessio file" via email from Karen Holloway and forwarded the records to the public records office on September 25, 2015 and again on October 8, 2015. See, UW002003, UW002455-UW002952.

University records reflect Ms. Holloway requested Plaintiff's department file be retrieved from Records Management Services again in December 2016 in response to Ms. Dalessio's PR-2016-760 request and subsequently forwarded a copy of Plaintiff's department file to Lauren

Fischer on December 12, 2016. The documents were forwarded to Amy Robles, who uploaded them to the public records office. See, UW002032-002401. Records reflect Ms. Holloway then located one more set of documents related to Plaintiff when she was clearing out her own office the last time upon retirement; she forwarded the documents to Amy Robles, Mr. Durant, and Ms. Fischer on December 16, 2016, and they were uploaded to the office of public records. UW00265-UW002299.

**Matt Maria**, former Program Coordinator, Lab Medicine: Records reflect former employee Matt Maria requested a box from Records Management Services warehouse (#43135) on or about September 21-22, 2015 that contained Plaintiff's department file from Laboratory Medicine in response to PRR-2015-00570. The box was returned to the warehouse on or about October 18, 2016. Records Management Services records reflect box #43135 contained "Personnel Records Terms, A-F, Year 2003". UW002966- UW002995.

Records reflect Mr. Maria again requested box #43135 from the Records Management Services warehouse (#43135) on or about December 5, 2016, that the box was checked out of Records Management Services on December 12, 2016 for delivery and returned to the Records Management warehouse December 15, 2016. UW002966- UW002995.

Records reflect that Mr. Maria may have originally sent the department files located in box #3 ("personnel records Terms A-F 2003") from the Lab Medicine Department (Harborview locations) to Records Management Services for off-site storage in 2005. UW002960-UW002964.

**Amy Robles**, UW Medicine Compliance Analyst, uploaded records responsive to PR-2016-00760 (Dalessio) to the public records office on or about December 22, 2016 in response to a request from public records analyst Andrew Palmer. UW002395-UW002399.

Records reflect Ms. Robles received additional records that Karen. Holloway located

when she was clearing out her office the last time upon retirement and forwarded on December 16, 2016. UW00265-UW002299. These were not documents maintained in Plaintiff's official HR Personnel or Laboratory Medicine Department file.

Ms. Robles uploaded a second installment of records responsive to PR-2016-00760 on or about January 6, 2017 to the public records office. See, UW002421-UW002422. Records reflect Ms. Robles obtained authorization for public records to request a snapshot of Rhoda Ashley Morrow's email account. UW002409-UW002414.

**Cheryl Manekia**, Program Operations Specialist, reported to public records Analyst Alison Swenson on April 25, 2016 that she searched and located no records of employment verification requests for Julie Dalessio or records responsive to PRR-16-00283. In September of 2015, Ms. Manakia searched for and forwarded records responsive to PRR-2015-00570 from the payroll office to Ms. Swenson in the public records office. UW000392, UW001992-UW001994.

**Odessa Visitacion**, Human Resources Specialist provided a certification on April 27, 2016 that she searched but located no records responsive to Public Records Request 16-00283 in the Medical Centers Human Resources Department files. UW001995.

**Paola Quinones, former Human Resources Specialist**: On October 9, 2015, Ms. Quinones forwarded records responsive to PRR-2015-570 from Campus Human Resources to Ms. Swenson in the public records office. On October 14, 2015, Ms. Quinones forwarded documents responsive PRR-2015-570 located in the Benefits Office to Ms. Swenson in Public Records. On October 21, 2015, Ms. Quinones forwarded a document received from the Disability Services Office (DSO) office responsive PRR-2015-570 to Ms. Swenson in public records. See, UW002001-UW002011.

On December 6, 2016, Ms. Quinones forwarded records responsive to PR-2016-00760 to public records analyst Andrew Palmer. On December 20, 2016, Ms. Quinones reported to Mr. Palmer that DSO did not have documents responsive to the request. UW002415-UW002420.

On April 27, 2017, Ms. Quinones reported to public records staff that the Campus Human Resources Office did not locate any records responsive to PRR-16-00283. UW001996-UW001998.

**Ana Marie Keeney**, Human Resources Consultant located copies of notice of charge and from the Washington State Human Rights Commission (WSHRC) sent to UW Human Resources in 2016 regarding Plaintiff's complaints WSHRC #17EZ-0220-16-7/EEOC #38G-2017-00020 and the Commission's final action finding no jurisdiction and related documents sent in 2016-2017. UW002966-UW00304.

5. Please identify any and all persons who had access to each of the locations identified in Interrogatory number four (4). This should include current and former employees, current and former contract workers, members of the public, or students of the University of Washington or University of Washington Medicine.

This interrogatory is addressed separately to and should be answered separately by:

- A. University of Washington
- B. Eliza Saunders
- C. Perry Tapper
- D. Alison Swenson
- E. Andrew Palmer

**RESPONSE: OBJECTION.** This request is unduly burdensome, overbroad, not proportional to the needs of the case, not reasonably calculated to lead to the discovery of admissible evidence, and vague ("locations"). However, the physical location requested in Interrogatory Number 4 was a "department" or "building." Even if this was narrowed to simply the room the file was kept

1  
2 I, Eliza A. Saunders, certify, on behalf of Defendant University of Washington, that I  
3 have read the foregoing *Plaintiff's First Set of Discovery Requests and Defendants'*  
4 *Objections and Responses Thereto* discovery requests and responses, and that the foregoing  
5 is true and correct to the best of my knowledge.

6 Dated: August 30, 2018

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8

9 Eliza A. Saunders  
10 Director, Office of Public Records and Open  
11 Public Meetings  
12 Defendant University of Washington

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The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JULIE DALESSIO, an individual,  
Plaintiff,

UNIVERSITY OF WASHINGTON, a Washington Public Corporation; ELIZA SAUNDERS, Director of the Office of Public Records, in her personal and official capacity; ALISON SWENSON, Compliance Analyst, in her personal capacity; PERRY TAPPER, Public Records Compliance Officer, in his personal capacity; ANDREW PALMER, Compliance Analyst, in his personal capacity; JOHN or JANES DOES 1-12, in his or her personal capacity,

## Defendants.

## **PRELIMINARY OBJECTIONS.**

Defendant Swenson objects to Plaintiff's preambulatory language and "instructions" in that they attempt to impose obligations beyond those found in the civil rules. Defendant will provide responses pursuant to Fe. R.Civ.P. 16, 33, and 34. Furthermore, Ms. Swenson's responses to these requests was already provided to Plaintiff's counsel in discovery responses served on July 6 and August 6, 2018.

DEFENDANT ALISON SWENSON'S  
RESPONSES TO PLAINTIFF'S FIRST SET OF  
DISCOVERY REQUESTS - 1

2:17-cv-00642-MJP  
1810-20251/Defendant Aliens

1010-00051/Defendant Alison Swenson Responses to Plaintiff's First Set of

**KEATING, BUCKLIN & MCCORMACK, INC., P.S.**  
ATTORNEYS AT LAW  
801 SECOND AVENUE, SUITE 1210  
SEATTLE, WASHINGTON 98104-1518  
PHONE: (206) 623-8861  
FAX: (206) 223-9423

I made all redactions to PR 2015-00570 that are identified on the PR-2015-00570 response provided to Plaintiff earlier in this litigation. *See*, UW 000009-UW 000378, produced to Plaintiff on or around June 1, 2017. The same documents appear in Dkt. #33, 32, 34 (under seal).

4. Please identify with specificity the location of each of the documents produced in PR 2015-00570 and PR 2016-00760. The specificity of the location should include: the department, the building, whether the location was secure (if so, how was it secure).

This interrogatory is addressed separately to and should be answered separately by:

- A. University of Washington;
- B. Eliza Saunders;
- C. Perry Tapper;
- D. Alison Swenson;
- E. Andrew Palmer;

**RESPONSE: OBJECTION.** This request is unduly burdensome; overbroad; not proportional to the needs of the case; not reasonably calculated to lead to the discovery of admissible evidence; irrelevant. Without waiving said objections, *see*, Defendant's Supplemental Initial Disclosures, sent to Plaintiff on May 18, 2018 for citations to documents and descriptions of who located and/or found the documents and where they were located when collected for transmittal to the Office of Public Records.

Copies of the documents produced in response to PR-2015-00570 (Betz request) were transmitted to the Office of Public Records and were located there while I processed them for release. The locations of where the documents were located then transmitted to me are reflected in the transmittal documents found at UW2001-2031. I do not have personal knowledge of the security of various buildings other than the Office of Public Records and Open Meetings, which is located behind doors that remain locked at all times. Documents

1 related to PRA requests that I am processing are stored on a computer system that is  
2 password protected and accessible only by OPR staff.  
3

4       5. Please identify any and all persons who had access to each of the locations  
5 identified in Interrogatory number four (4). This should include current and former  
6 employees, current and former contract workers, members of the public, or students of the  
7 University of Washington or University of Washington Medicine.

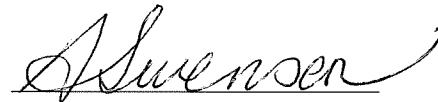
8       This interrogatory is addressed separately to and should be answered separately by:

9       A. University of Washington  
10      B. Eliza Saunders  
11      C. Perry Tapper  
12      D. Alison Swenson  
13      E. Andrew Palmer

14       **RESPONSE: OBJECTION.** This request is unduly burdensome, overbroad, not  
15 proportional to the needs of the case, not reasonably calculated to lead to the discovery of  
16 admissible evidence, and vague (“locations”). However, the physical location requested in  
17 Interrogatory Number 4 was a “department” or “building.” Even if this was narrowed to  
18 simply the room the file was kept in, it would still be inordinately disproportionate to the  
19 needs of the case to have Defendants somehow track down each person who may have “had  
20 access to” each of the locations at any point in in the past 15-30 years.

21       Without waiving the foregoing objection, copies of the documents produced in  
22 response to PR-2016-00570 (Betz request) were transmitted electronically to the Office of  
23 Public Records from other University departments and were located electronically there  
24 while I processed them for release to Mr. Betz. I do not have personal knowledge regarding  
25 the locations of where each of the documents were located or maintained prior to being  
26 transmitted to me, other than what is reflected in copies of the transmittal documents and

1 state of Washington that they are true and correct to the best of my knowledge and belief.  
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4

5 Alison Swenson  
6

7 Responses submitted and certified in compliance with FRCP 26(g).  
8

9 KEATING, BUCKLIN & McCORMACK, INC., P.S.  
10

11 By: /s/ Jayne L. Freeman  
12 Jayne L. Freeman, WSBA #24318  
13 Special Assistant Attorney General for Defendants  
14

15 801 Second Avenue, Suite 1210  
16 Seattle, WA 98104-1518  
17 Telephone: (206) 623-8861  
18 Fax: (206) 223-9423  
19 Email: [jfreeman@kbmlawyers.com](mailto:jfreeman@kbmlawyers.com)  
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DEFENDANT ALISON SWENSON'S  
RESPONSES TO PLAINTIFF'S FIRST SET OF  
DISCOVERY REQUESTS - 9  
2:17-cv-00642-MJP

1010-00051/Defendant Alison Swenson Responses to Plaintiff's First Set of

KEATING, BUCKLIN & McCORMACK, INC., P.S.  
ATTORNEYS AT LAW  
801 SECOND AVENUE, SUITE 1210  
SEATTLE, WASHINGTON 98104-1518  
PHONE: (206) 623-8861  
FAX: (206) 223-9423

**Alison D. Swenson**

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**From:** Public Records <pubrec@uw.edu>  
**Sent:** Wednesday, September 16, 2015 11:35 AM  
**To:** MINDY KORNBERG; Cheryl Manekia; Cynthia L. Dold  
**Cc:** Paola M. Quinones; Jeanne A. Miele  
**Subject:** RE: New Public Records Request: PR-2015-00570 (Betz)  
**Attachments:** Betz request.pdf

My apologies. Request attached here. Thank you.

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**From:** Public Records [mailto:[pubrec@uw.edu](mailto:pubrec@uw.edu)]  
**Sent:** Wednesday, September 16, 2015 11:34 AM  
**To:** 'mindyk@u.washington.edu'; Cheryl Manekia; Cynthia L. Dold  
**Cc:** Paola M. Quinones; Jeanne A. Miele  
**Subject:** New Public Records Request: PR-2015-00570 (Betz)

\*\*\*\*\*Immediate attention required: This is a time-sensitive request for assistance from the Office of Public Records and Open Public Meetings. Please respond by September 30, 2015.\*\*\*\*\*

Dear Mindy Kornberg, Cheryl Manekia, Cynthia Dold:

Attached to this email is a new public records request. You are being asked to help the University respond promptly to this request by taking the following steps:

1. Immediately identify all locations, within your area of responsibility, for any record that may be responsive to this request, including any records held by others within your school, college, unit, division or department. Attached is a list of factors that must be considered when identifying records responsive to this request.
2. Immediately preserve potentially responsive records from destruction or alteration.
3. After you collect the responsive records, send electronic or hard copies of them to the Office of Public Records and Open Public Meetings, University of Washington, Box 354997. It is critical that the copies you send are single-sided and unstapled, and that you include a copy of this letter with your submission.
4. Please call the staff at the Office of Public Records and Open Public Meetings at 543-9180 with any questions or concerns you may have about this request.

The following individuals at their respective departments have been contacted regarding this public records request:

- If the request seeks a potentially large volume of records, you should work closely with the Office of Public Records and Open Public Meetings to determine a prompt timeframe for collection of records. The Office of Public Records and Open Public Meetings may explore with the requestor clarifying, narrowing, or prioritizing the request. You should not contact the requestor directly.
- Certain records may be found in more than one UW location. You should not assume that someone else is going to provide records that you also have in your control.
- The consequences of not responding promptly or completely to a request are very serious. The University could be sued and could face costly fines and legal costs for not complying fully with the requirements of the public records law.

**Alison D. Swenson**

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**From:** Jeanne Miele <jmiele@uw.edu>  
**Sent:** Thursday, October 08, 2015 8:36 AM  
**To:** Alison D. Swenson; Margi Wadden  
**Subject:** RE: PR 2015-00570 (Betz)

No problem. I will resend the message so that you see the original date on it!  
☺

---

**From:** Alison D. Swenson [<mailto:swensona@uw.edu>]  
**Sent:** Thursday, October 08, 2015 8:33 AM  
**To:** Jeanne A. Miele; Margi Wadden  
**Subject:** RE: PR 2015-00570 (Betz)

Thank you for the very quick response. I just checked pubrec and they are not there....not sure how or why, but could you resend them? Sorry for any inconvenience.

*Alison Swenson  
Compliance Analyst  
Office of Public Records and Open Public Meetings*

*Roosevelt Commons Box 354997  
4311 11<sup>th</sup> Ave NE, Suite 360 Seattle, WA 98105  
206.543.9180 / fax 206.636.6294  
[pubrec@uw.edu](mailto:pubrec@uw.edu) / [washington.edu](http://washington.edu)*

**W** UNIVERSITY of WASHINGTON

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**From:** Jeanne Miele [<mailto:jmiele@uw.edu>]  
**Sent:** Thursday, October 08, 2015 8:29 AM  
**To:** Alison D. Swenson; Margi Wadden  
**Subject:** RE: PR 2015-00570 (Betz)

Alison –  
This was sent to you on 9/25 and closed.  
Would you like me to **resend** it, or do you want to check your PubRec file first?  
Jeanne

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**From:** Alison D. Swenson [<mailto:swensona@uw.edu>]  
**Sent:** Thursday, October 08, 2015 8:26 AM  
**To:** Margi Wadden; Jeanne A. Miele  
**Subject:** PR 2015-00570 (Betz)

Good morning!

**Alison D. Swenson**

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**From:** Paola M. Quinones  
**Sent:** Wednesday, October 21, 2015 2:45 PM  
**To:** Public Records Office  
**Cc:** Alison D. Swenson  
**Subject:** RE: New Public Records Request: PR-2015-00570 (Betz)  
**Attachments:** 15-00570 - Betz records from DSO.pdf

Hi Alison,

This is the last document we were waiting on from DSO. This completes the request.

Thank you,

Paola

**Paola M. Quiñones**

**From:** Public Records [mailto:[pubrec@uw.edu](mailto:pubrec@uw.edu)]  
**Sent:** Wednesday, September 16, 2015 11:35 AM  
**To:** MINDY KORNBERG <[mindyk@uw.edu](mailto:mindyk@uw.edu)>; Cheryl Manekia <[cmanekia@uw.edu](mailto:cmanekia@uw.edu)>; Cynthia L. Dold <[cdold@uw.edu](mailto:cdold@uw.edu)>  
**Cc:** Paola M. Quinones <[pmquino@uw.edu](mailto:pmquino@uw.edu)>; Jeanne A. Miele <[jmiele@uw.edu](mailto:jmiele@uw.edu)>  
**Subject:** RE: New Public Records Request: PR-2015-00570 (Betz)

My apologies. Request attached here. Thank you.

---

**From:** Public Records [mailto:[pubrec@uw.edu](mailto:pubrec@uw.edu)]  
**Sent:** Wednesday, September 16, 2015 11:34 AM  
**To:** 'mindyk@u.washington.edu'; Cheryl Manekia; Cynthia L. Dold  
**Cc:** Paola M. Quinones; Jeanne A. Miele  
**Subject:** New Public Records Request: PR-2015-00570 (Betz)

\*\*\*\*\*Immediate attention required: This is a time-sensitive request for assistance from the Office of Public Records and Open Public Meetings. Please respond by September 30, 2015.\*\*\*\*\*

Dear Mindy Kornberg, Cheryl Manekia, Cynthia Dold:

Attached to this email is a new public records request. You are being asked to help the University respond promptly to this request by taking the following steps:

1. Immediately identify all locations, within your area of responsibility, for any record that may be responsive to this request, including any records held by others within your school, college, unit, division or department. Attached is a list of factors that must be considered when identifying records responsive to this request.

- You may not destroy or alter a requested record. This includes records that exist at the time a public records request is received by the University even though it may have passed its legal records retention period or is required to be destroyed by a contract.
- The University is legally required to identify all responsive records, even those it might choose to withhold from disclosure under one of the Public Records Act permissible exemptions. Thus, you must collect and send all records to the Office of Public Records and Open Public Meetings, even those you consider confidential or personal, those an outside party considers confidential (such as a vendor or licensee) or personal, or those you consider covered by the attorney-client privilege. The University might not release such records if they fall within one of the exemptions to the Public Records Act, but it must provide the requestor an inventory that identifies all records it chooses to exempt.
- If the request seeks a potentially large volume of records, you should work closely with the Office of Public Records and Open Public Meetings to determine a prompt timeframe for collection of records. The Office of Public Records and Open Public Meetings may explore with the requestor clarifying, narrowing, or prioritizing the request. You should not contact the requestor directly.
- Certain records may be found in more than one UW location. You should not assume that someone else is going to provide records that you also have in your control.
- The consequences of not responding promptly or completely to a request are very serious. The University could be sued and could face costly fines and legal costs for not complying fully with the requirements of the public records law.

**Alison D. Swenson**

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**From:** Public Records <pubrec@uw.edu>  
**Sent:** Wednesday, September 23, 2015 10:51 AM  
**To:** david@impactlawgroup.com  
**Subject:** Public Records Request PR-2015-00570 (Betz)

September 23, 2015

Mr. David F. Betz  
IMPACTLAWGROUP PLLC  
1325 Fourth Avenue, Suite 1400  
Seattle, AL 98101

Re: Public Records Request PR-2015-00570

Dear Mr. Betz:

I am writing to acknowledge receipt of your public records request on September 16, 2015. We estimate we will respond to your request by October 14, 2015. As allowed by RCW 42.56.520, if additional time is needed to locate, review or assemble documents or to notify third parties affected by your request, we will contact you.

If you need to contact us about your request, please have the request number noted above available. If you have any questions, please feel free to contact this office.

Sincerely,

Alison Swenson  
Compliance Analyst  
UNIVERSITY OF WASHINGTON  
Office of Public Records and Open Public Meetings  
Mail: Roosevelt Commons-Box 354997, Seattle, WA 98195  
Street: 4311 11th Ave NE, #360  
206.543.9180 fax 206.616.6294  
[pubrec@uw.edu](mailto:pubrec@uw.edu) <http://depts.washington.edu/pubrec/>

**Alison D. Swenson**

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**From:** Public Records <pubrec@uw.edu>  
**Sent:** Wednesday, October 14, 2015 9:04 AM  
**To:** david@impactlawgroup.com  
**Subject:** Public Records Request PR-2015-00570 (Betz)

October 14, 2015

Mr. David F. Betz  
IMPACTLAWGROUP PLLC  
1325 Fourth Avenue, Suite 1400  
Seattle, AL 98101

Re: Public Records Request PR-2015-00570

Dear Mr. Betz:

The Office of Public Records and Open Public Meetings finds it necessary to extend the response date to your public records request to December 7, 2015. This extension is allowed by RCW 42.56.520 of the Public Records Act of Washington State. The extension is needed to locate, review or assemble documents or to notify third parties affected by your request.

Please let us know if you have any questions.

Sincerely,

Alison Swenson  
Compliance Analyst  
UNIVERSITY OF WASHINGTON  
Office of Public Records and Open Public Meetings  
Mail: Roosevelt Commons-Box 354997, Seattle, WA 98195  
Street: 4311 11th Ave NE, #360  
206.543.9180 fax 206.616.6294  
[pubrec@uw.edu](mailto:pubrec@uw.edu) <http://depts.washington.edu/pubrec/>

**Alison D. Swenson**

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**From:** Alison D. Swenson  
**Sent:** Thursday, September 24, 2015 5:00 PM  
**To:** Public Records Office  
**Subject:** RE: New Public Records Request: PR-2015-00570 (Betz)

Thank you Paola. I will extend the due date to October 7, 2015.

*Alison Swenson  
Compliance Analyst  
Office of Public Records and Open Public Meetings*

*Roosevelt Commons Box 354997  
4311 11<sup>th</sup> Ave NE, Suite 360 Seattle, WA 98105  
206.543.9180 / fax 206.546.5294  
[pubrec@uw.edu](mailto:pubrec@uw.edu) / [washington.edu](http://washington.edu)*

**W** UNIVERSITY of WASHINGTON

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**From:** Public Records [mailto:[pubrec@uw.edu](mailto:pubrec@uw.edu)]  
**Sent:** Thursday, September 24, 2015 4:55 PM  
**To:** Alison D. Swenson  
**Subject:** FW: New Public Records Request: PR-2015-00570 (Betz)

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**From:** Paola M. Quinones [mailto:[pmquino@uw.edu](mailto:pmquino@uw.edu)]  
**Sent:** Thursday, September 24, 2015 4:50 PM  
**To:** Public Records Office <[pubrec@uw.edu](mailto:pubrec@uw.edu)>  
**Subject:** RE: New Public Records Request: PR-2015-00570 (Betz)

Good afternoon,

We would like to request an extension for 15-00570 until October 7<sup>th</sup>, UWMC would like to review over files they've received from record office and I will be out of the office September 30<sup>th</sup> – October 6<sup>th</sup>.

Thank you,

Paola

**Paola M. Quiñones**

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**From:** Public Records [mailto:[pubrec@uw.edu](mailto:pubrec@uw.edu)]  
**Sent:** Wednesday, September 16, 2015 11:35 AM  
**To:** MINDY KORNBERG <[mindyk@uw.edu](mailto:mindyk@uw.edu)>; Cheryl Manekia <[cmanekia@uw.edu](mailto:cmanekia@uw.edu)>; Cynthia L. Dold <[cdold@uw.edu](mailto:cdold@uw.edu)>  
**Cc:** Paola M. Quinones <[pmquino@uw.edu](mailto:pmquino@uw.edu)>; Jeanne A. Miele <[jmiele@uw.edu](mailto:jmiele@uw.edu)>  
**Subject:** RE: New Public Records Request: PR-2015-00570 (Betz)

Sincerely,

Alison Swenson  
Compliance Analyst  
UNIVERSITY OF WASHINGTON  
Office of Public Records and Open Public Meetings  
Mail: Roosevelt Commons-Box 354997, Seattle, WA 98195  
Street: 4311 11th Ave NE, #360  
206.543.9180 fax 206.616.6294  
[pubrec@uw.edu](mailto:pubrec@uw.edu) <http://depts.washington.edu/pubrec/>

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#### Responding to Requests for Public Records

- Any record prepared, owned, used or retained by the University, and that concerns University business, is considered a public record and must be provided to the Office of Public Records and Open Public Meetings.
- The definition of a "record" is very broad and includes correspondence, hand-written notes, forms, electronic records (such as email and databases), research records, visual records such as pictures, cd(s) or videos, audio records etc.
- You may not destroy or alter a requested record. This includes records that exist at the time a public records request is received by the University even though it may have passed its legal records retention period or is required to be destroyed by a contract.
- The University is legally required to identify all responsive records, even those it might choose to withhold from disclosure under one of the Public Records Act permissible exemptions. Thus, you must collect and send all records to the Office of Public Records and Open Public Meetings, even those you consider confidential or personal, those an outside party considers confidential (such as a vendor or licensee) or personal, or those you consider covered by the attorney-client privilege. The University might not release such records if they fall within one of the exemptions to the Public Records Act, but it must provide the requestor an inventory that identifies all records it chooses to exempt.
- If the request seeks a potentially large volume of records, you should work closely with the Office of Public Records and Open Public Meetings to determine a prompt timeframe for collection of records. The Office of Public Records and Open Public Meetings may explore with the requestor clarifying, narrowing, or prioritizing the request. You should not contact the requestor directly.
- Certain records may be found in more than one UW location. You should not assume that someone else is going to provide records that you also have in your control.
- The consequences of not responding promptly or completely to a request are very serious. The University could be sued and could face costly fines and legal costs for not complying fully with the requirements of the public records law.

**Alison D. Swenson**

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**From:** Paola M. Quinones  
**Sent:** Wednesday, October 14, 2015 8:32 AM  
**To:** Public Records Office  
**Cc:** Alison D. Swenson  
**Subject:** FW: New Public Records Request: PR-2015-00570 (Betz)  
**Attachments:** 15-00570 - Dalessio, Julie BENEFITS.pdf

Alison,

I've obtained the following from Benefits, still waiting on DSO files.

Paola

**Paola M. Quiñones**

**From:** Paola M. Quinones  
**Sent:** Friday, October 09, 2015 11:20 AM  
**To:** 'Public Records' <pubrec@uw.edu>  
**Cc:** Alison D. Swenson <swensona@uw.edu>  
**Subject:** RE: New Public Records Request: PR-2015-00570 (Betz)

Hi Alison,

Please see attached documents for Betz (15-00570). While reviewing the documentation received, I noticed that we might have additional records in DSO and Benefits. I will let you know what I find out.

Thank you,

Paola

**Paola M. Quiñones**

**From:** Public Records [<mailto:pubrec@uw.edu>]  
**Sent:** Thursday, September 24, 2015 5:03 PM  
**To:** Paola M. Quinones <[pmquino@uw.edu](mailto:pmquino@uw.edu)>  
**Subject:** FW: New Public Records Request: PR-2015-00570 (Betz)

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**From:** Alison D. Swenson [<mailto:swensona@uw.edu>]  
**Sent:** Thursday, September 24, 2015 5:00 PM  
**To:** Public Records Office  
**Subject:** RE: New Public Records Request: PR-2015-00570 (Betz)

Thank you Paola. I will extend the due date to October 7, 2015.

Dear Mindy Kornberg, Cheryl Manekia, Cynthia Dold:

Attached to this email is a new public records request. You are being asked to help the University respond promptly to this request by taking the following steps:

1. Immediately identify all locations, within your area of responsibility, for any record that may be responsive to this request, including any records held by others within your school, college, unit, division or department. Attached is a list of factors that must be considered when identifying records responsive to this request.
2. Immediately preserve potentially responsive records from destruction or alteration.
3. After you collect the responsive records, send electronic or hard copies of them to the Office of Public Records and Open Public Meetings, University of Washington, Box 354997. It is critical that the copies you send are single-sided and unstapled, and that you include a copy of this letter with your submission.
4. Please call the staff at the Office of Public Records and Open Public Meetings at 543-9180 with any questions or concerns you may have about this request.

The following individuals at their respective departments have been contacted regarding this public records request:

Mindy Kornberg, Human Resources, Upper Campus  
Cheryl Manekia, Payroll, UW  
Cynthia Dold, UW Medicine

If you are aware of additional faculty, staff, departments, or entities which may have records related to this request, please notify this office as soon as possible.

Thank you for your assistance in helping the University respond to the attached public records request in a timely and efficient manner.

Sincerely,

Alison Swenson  
Compliance Analyst  
UNIVERSITY OF WASHINGTON  
Office of Public Records and Open Public Meetings  
Mail: Roosevelt Commons-Box 354997, Seattle, WA 98195  
Street: 4311 11th Ave NE, #360  
206.543.9180 fax 206.616.6294  
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